

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its 2012-2014 California Alternate Rates for Energy (CARE) and Energy Savings Assistance Programs and Budgets.

Application 11-05-017
(Filed May 16, 2011)

And Related Matters.

Application 11-05-018
Application 11-05-019
Application 11-05-020

**DECISION GRANTING COMPENSATION TO CALIFORNIA HOUSING
PARTNERSHIP CORPORATION FOR SUBSTANTIAL CONTRIBUTION TO
DECISION 14-08-030**

Claimant: California Housing Partnership Corporation (CHPC)	For contribution to Decision (D.) 14-08-030
Claimed (\$): \$41,620.00	Awarded (\$): \$35,463.40 (~14.79% reduction)
Assigned Commissioner: Catherine J.K. Sandoval	Assigned ALJ: Kimberly Kim

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision:	<p>D.14-08-030 resolves outstanding issues identified for “Phase Two” following the August 30, 2012 Phase One Decision (12-08-044), which authorized the ESA and CARE Program Budgets for the Utilities’ 2012-2014 program cycle.</p> <p>D.14-08-030 provides program directions and guidance to the IOUs in preparation of their program years 2015-2017 CARE and ESA Programs and Budget Applications.</p> <p>Of particular concern to CHPC, the decision adopts and directs implementation of the recommendations of several studies and working groups, including the 2013 Multifamily Segment Phase I Study and the Mid-cycle Working Group, which directly affect multifamily housing.</p>
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	The decision orders that these studies and working groups' reports, findings and recommendations inform and guide the IOUs in their preparation of their 2015-2017 ESA and CARE Program applications. The IOUs are directed to incorporate, the findings and recommendations from these studies to improve the ESA and CARE Programs in the future cycles.
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B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	August 8, 2011	Verified.
2. Other Specified Date for NOI:	n/a	
3. Date NOI Filed:	September 7, 2011	Verified.
4. Was the NOI timely filed?		Yes, CHPC timely filed the NOI.
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.11-05-017 et al.	
6. Date of ALJ ruling:	See comment (Line 6) below	
7. Based on another CPUC determination (specify):	n/a	
8. Has the Claimant demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A. 11-05-017 et al.	
10. Date of ALJ ruling:	See comment (Line 10) below	
11. Based on another CPUC determination (specify):	A.12-07-001 et al; 01/04/2013	
12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-08-030	Verified.
14. Date of Issuance of Final Order or Decision:	August 14, 2014	August 20, 2014.
15. File date of compensation request:	October 20, 2014	
16. Was the request for compensation timely?		Yes, CHPC timely filed the request for

	compensation.
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C. Additional Comments on Part I:

#	Claimant	CPUC	Comment
Line 6	CHPC	Verified.	No ruling was issued in response to CHPC's timely filed Notice of Intent to Claim Intervenor Compensation. CHPC demonstrated its customer status in its NOI (Filed September 7, 2011). Please see Part 1(A) of our NOI and the related attachments. Attachment 3
Line 10	CHPC	Verified.	Since no ruling issued in response to CHPC's NOI, CHPC does not have a determination of significant financial hardship for this proceeding, please refer to section Part III(C) of our NOI for our demonstration of financial hardship. In addition, for the proceeding A.12-07-001 et al, CHPC received a ruling that we had demonstrated significant financial hardship on January 4, 2013. Attachment 4

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. Property Owner Path: Direct the IOUs to work directly with property owners to improve the delivery system of ESAP services in multifamily rental housing to low-income residents.</p> <p>CHPC made recommendations to overcome barriers accessing ESAP services faced by tenants living in multifamily housing. The recommendations came from a network of multifamily owners contacted by CHPC over the past 4 years. CHPC recommends working directly with property owners to increase enrollment by streamlining permissions and improving energy savings through a "whole building" approach to energy efficiency upgrades.</p>	<p>"Comments of CHPC, NHLP on May 13, 2014 Proposed "Phase II Decision on The Large Investor-Owned Utilities'2012-2014 ESA and CARE Applications" filed June 2, 2014 (June 2nd Comments) on page 5-6:</p> <p>"The IOUs must create a pathway to work with the owners of multifamily properties if they are to achieve the twin goals of reaching more customers and achieving deeper energy savings in each building reached. As the studies have shown, working through the property owner in multifamily properties is the most efficient and effective way to provide retrofit services and, if done appropriately, results in shared benefits for low-income residents. The proposed decision offers substantial guidance</p>	<p>Verified; but we note CHPC put forth arguments that were duplicative of NCLC and ACCES on the Property Owner Path issue. This demonstrates that these parties failed to adequately coordinate, which</p>

	<p>toward this goal but it needs to be amended to provide explicit direction for the IOUs serving larger multifamily properties to work directly with property owners instead of restricting their approach to just individual tenant households.”</p> <p>“Comments of NCLC, CHPC, NHLP, NRDC on The Phase II Alternate Proposed Decision Of Commissioner Florio” filed July 17, 2014 (July 17th Comments) on page 4: “This rule change [working directly with property owners] is necessary to overcome three barriers to participation identified in the Low Income Needs Assessment, specifically (1) easily obtaining property owner permission for the ESAP services, (2) arranging access to homes for service appointments when the tenant is unavailable, and (3) establishing trust and credibility for ESAP contractors in instances where the tenant may be wary of unfamiliar workers in their home.”</p> <p>D.14-08-030 at p. 62 and p.120: “(1) The Utilities serving multifamily properties shall work directly with property owners where this approach reduces barriers to participation...”</p>	<p>resulted in duplicitous efforts.¹</p>
<p>2. Housing Subsidies Cannot be Counted as “Income”: Clarify income eligibility rules to provide that the value of non-cash housing subsidies should not be counted as income for purposes of qualifying for ESAP.</p> <p>CHPC recommended that counting the subsidies in government-assisted housing is not possible, nor appropriate to</p>	<p>“Comments of NCLC, CHPC, NHLP, NRDC on the February 25, 2014 Assigned Commissioner Ruling on Categorical Eligibility and Enrollment and Definition of Income” filed March 11, 2014 (March 11th Comments) on page 4:</p> <p>“The non-cash value of housing subsidies offered to subsidized housing tenants should not be counted as income. In brief, we urge this because:</p>	<p>Verified, but CHPC put forth arguments that were duplicative of Greenlining, NCLC, and TURN on the Housing</p>

¹ 2015 Cal. PUC LEXIS 264 (Cal. PUC 2015).

<p>determine qualification for energy assistance.</p>	<p>(a) For most of the subsidized housing programs (public housing, Project-Based Vouchers, and LIHTC), the value of that subsidy cannot be calculated on an individual-unit basis, as the subsidies flow to the owner and are not attached to specific units;</p> <p>(b) The value of housing subsidies is not counted as income in other income-tested programs, according to expert testimony provided in this docket, with CARE/ESAP being the notable exception;</p> <p>(c) Based on the available information, over 90% of subsidized housing tenants would still be eligible for CARE and ESAP even if it were possible to count the value of the subsidy;</p> <p>(d) A policy that requires the documentation and counting of housing subsidies will prove extremely difficult to administer in an equitable fashion and will lead to irrational results.”</p> <p>“Reply Comments of NCLC, CHPC, NHLP, NRDC on the February 25, 2014 “Assigned Commissioner Ruling on Categorical Eligibility and Enrollment and Definition of Income” filed March 17, 2014 (March 17th Comments) on page 2:</p> <p>“In response to question 4 appended to the Ruling, there is a growing consensus, albeit not unanimity, that the value of housing subsidies should not be counted as income. Several parties strongly support the position of the Multifamily Coalition that the value of these subsidies generally cannot be determined and, even if it can, should not be counted as eligible income for ESAP. Some of the utilities acknowledge that the costs and burdens of counting housing subsidies (assuming the value can be determined) may outweigh any programmatic benefits.”</p>	<p>Subsidies Issue.</p>
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	<p>June 2nd comments, p.9: “The Expedited Enrollment proposal has languished without action for three years, in large part due to the unsupported argument that the value of “housing subsidy” for assisted housing needs to be and is being quantified by ESAP staff. There has been no evidence presented that existing enrollment procedures have ever counted assisted housing subsidies as income for ESAP, and residents of assisted housing continue to be enrolled in ESAP despite the fact that assisted housing subsidies cannot be quantified for individual tenants.</p> <p>July 17th Comments, p. 5: “NCLC, CHPC and NHLP first recommended that the value of housing subsidy should not be included in the calculation of income when they jointly filed the testimony of Wayne Waite on November 18, 2011. Mr. Waite testified that the value of housing subsidy for individual households simply cannot be calculated for most of the major housing programs, and for the remaining housing program - the housing choice voucher program - it would be the rare tenant who could produce the relevant documentation.”</p> <p>D.14-08-030 at p. 62 and p.120: “3) Housing subsidies are not counted as income...”</p>	
<p>3. Expedited Enrollment: Adopt “expedited enrollment” in order to streamline income eligibility and verification for low-income residents of government-assisted housing by using existing income documentation verified by other government agencies.</p> <p>CHPC recommended that the IOUs utilize the income documentation verified by</p>	<p>June 2nd comments p.8: “The CPUC should amend the proposed decision to direct the utilities to adopt expedited enrollment for assisted multifamily housing as a means to increase program enrollment and save administrative costs.”</p> <p>June 2nd comments p. 10: “Expedited enrollment saves time and money and eliminates the barrier of inconvenience</p>	<p>Verified, but CHPC put forth arguments that were duplicative of NCLC on the Expedited Enrollment issue.</p>

<p>government agencies for purposes of qualifying residents living in assisted housing for ESAP services. This will remove a barrier to enrollment and save administrative time and expense.</p>	<p>for customers.”</p> <p>July 17th comments, p. 7: “Adoption of expedited enrollment will streamline ESAP implementation by removing the administrative barrier of conducting income documentation that is duplicative of HUD’s own rigorous process.”</p> <p>Notice Of <i>Ex Parte</i> Communication Of CHPC, NCLC and NHLP with Advisors to Commissioners Sandoval and Florio, filed Dec 17, 2013 (<i>Ex parte</i> Dec 17th): “During the meetings CHPC, NCLC and NHLP representatives provided a copy of the CHPC publication ‘<i>Greening City Gardens</i>’ ...,” which includes the following: Key Lessons Learned at City Gardens: • Income Eligibility Requirements: Conforming ESAP to national and state best practices for income eligibility and using pre-qualified property lists created by government housing agencies would reduce or prevent the need for door-to-door contact and significantly decrease administrative expenses.” (p.6)</p> <p><i>Ex Parte</i> Notice Of CHPC, NRDC, TURN With Advisors To President Peevey And Commissioners Peterman And Picker filed August 1, 2014 (<i>ExParte</i> Aug. 1st) provided an attachment of an open letter to the President and Commissioners including: “Expedited Enrollment is simply an efficient means to verify income to determine ESAP eligibility. It does not alter or expand the criteria for ESAP eligibility.” (p.1)</p> <p>D.14-08-030 at p. 63 and 120: “(4) The Utilities shall propose an expedited enrollment process for the United States Department of Housing and Urban Development assisted multifamily housing wherein at least 80% of the</p>	
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	tenants have incomes at or below 200% of federal poverty level (FPL)..."	
<p>4. Single Point of Contact: Designate a "Single Point of Contact" to help property owners access and coordinate usage of ESAP, Energy Upgrade and other energy efficiency programs.</p> <p>CHPC's recommendations come from the experiences of a network of property owners and reflect the challenges and obstacles they have faced using the IOUs energy efficiency programs. The single point of contact can increase participation in the energy assistance program and ensure that funds are spent efficiently.</p>	<p>June 2nd comments p.7: "CHPC and NHLP agree with the proposed decision that creating a comprehensive path for owners begins with a single point of contact that helps building owners to combine ESAP with general energy efficiency programs. All of the IOUs have created single points of contact for the Energy Upgrade CA program, but unless the CPUC amends the proposed decision to require information sharing between the programs, the goal of having a single point of contact for ESAP and general EE programs will not be met. Coordinating these two energy savings programs for purposes of meeting the unmet needs in multifamily housing is key to maximizing lagging enrollment of multifamily residents in ESAP, as well as to improving energy savings."</p> <p>July 17th Comments p. 8: "A single point of contact is highly valued by owners. As Dan Levine, Senior Vice President for construction at the John Stewart Company, testified: 'Generally, multifamily rental properties struggle to access the ESAP, general energy efficiency, and any other available efficiency programs in a coordinated way that minimizes the amount of effort and intrusion into the building. We struggle to sort through and access the myriad utility programs available to multifamily rental properties, comply with the program requirements and complete and file application and rebate forms...As a result, we recommend a whole-building approach and the creation of a "one-stop shop" that maximizes the amount of assistance tenants and building owner/managers can receive by accessing the various energy efficiency programs in a coordinated way..."</p>	<p>Verified, but CHPC put forth arguments that were duplicative of NCLC and ACCES on the Single Point of Contact issue.</p>

	<p><i>ExParte</i> Dec. 17th: “During the meetings CHPC, NCLC and NHLP representatives provided a copy of the CHPC publication ‘<i>Greening City Gardens</i>’ ...” which includes the following: “Key Lessons Learned at City Gardens: • Single Point of Contact: Identifying a single point of contact at the utilities to help deliver direct install and rebate incentives is key to leveraging existing programs and achieving deeper savings.” (p.6)</p> <p>D.14-08-030 at p. 63 and 120: “(5) The Utilities shall appoint a single point of contact for the Energy Savings Assistance Program, as is already the case for the Energy Upgrade California program; and</p> <p>D.14-08-030 at page 64: “We also believe a single point of contact and coordination will enable the IOUs to provide technical support to building owners to ensure that funds from different programs are spent cost-effectively and without redundancy.”</p>	
<p>5. Energy Efficiency Program Coordination: Direct the IOUs to coordinate ESAP with the other energy efficiency programs, particularly Energy Upgrade California.</p> <p>CHPC made this recommendation in order to provide deeper energy savings. CHPC shared the experiences of a demonstration program we developed at “City Gardens” an affordable housing development in Santa Ana California. This demonstration provides insights on the effectiveness and challenges of improved coordination among the IOUs energy efficiency program.</p>	<p>June 2nd comments p. 3: CHPC recommended “Leverage ESAP With Energy Upgrade CA: Enable the utilities to share information between the ESAP and Energy Upgrade programs and coordinate and integrate programs to ensure comprehensive and cost effective multifamily housing energy efficiency services are provided.”</p> <p>June 2nd comments pp.12-13: “The IOUs’ applications should provide a process for enabling ESAP funding in multifamily housing for the purpose of heating, cooling, hot water and common area measures, based on coordination with the Energy Upgrade CA program. Coordination should include the shared use of the “whole building” audits.”</p>	Verified.

	<p>July 17th comments, p.9: “Additional [program] coordination can help achieve extremely positive results. In 2012, Southern California Gas Co. and Southern California Edison Co. worked directly with CHPC and an affordable housing owner, LINC Housing, on an energy efficiency retrofit of the 274 unit City Gardens property. City Gardens was able to incorporate incentives from ESA, the MFEER, and the California Solar Initiative, as well as Fannie Mae Green financing, to cover additional costs of the retrofit. This leveraging of incentives and technical assistance helped motivate the owner to participate despite the significant staff time necessary to oversee and carry out the retrofit work. This case study provides an example of what can be accomplished, but demonstrates that extra efforts are needed for coordination to occur and to maximize utilization.”</p> <p><i>Ex Parte</i> Dec. 17th: “During the meetings CHPC, NCLC and NHLP representatives provided a copy of the CHPC publication ‘<i>Greening City Gardens</i>’ ...,” which includes the following: “However, for many owners throughout the state utility programs remain difficult to leverage concurrently because they are not offered in an integrated or coordinated way.... This “siloe” process is highly inefficient and can lead to delays in the execution of a retrofit, causing disruption for residents and increasing frustration and confusion for all parties. As a result, multifamily residential owners often choose not to use incentive programs and miss opportunities for deeper energy savings.” (p.7)</p> <p>D.14-08-030 at p. 63 and 120-121: “(6) The Utilities shall coordinate among Energy Savings Assistance, California Alternate Rates for Energy and Energy</p>	
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	Upgrade California, including any potential pooling of funds among programs where such pooling maximizes energy efficiency treatment of multifamily housing and ensures that more potential eligible customers are enrolled.”	
<p>6. New Measures: ESAP should enable more energy savings measures for multifamily housing such as heating, cooling, hot water and common area measures.</p> <p>CHPC made this recommendation based on the experience energy savings audits in multifamily buildings, which demonstrate these measures can greatly improve energy savings and as a result increase participation in the program.</p>	<p>June 2nd comments p. 4: CHPC recommended “Expand Range Of Eligible Measures: Require the IOU applications to enable ESAP to fund heating, cooling, hot water and common area measures in multifamily housing. The IOUs should establish criteria to qualify these measures for ESAP funding in low-income multifamily properties. This should be done in coordination with the Energy Upgrade CA program, which includes “whole building” assessments to determine the most critical retrofit measures for each multifamily property based on its specific utility configuration.</p> <p>June 2nd Comments p. 13: “Any potential concerns about the cost of supplementing ESAP to include additional measures should not preclude the Commission from moving in this direction. There is ample evidence in the record of this proceeding documenting strategies to limit costs borne through ESAP, including spending caps and cost-sharing opportunities, as well as cost leveraging through program coordination.”</p> <p><i>Ex Parte</i> Aug. 1st: “The APD authorizes a process to develop budgets and propose additional ESAP measures, only to the extent they are justified.” (p.2)</p> <p>July 17th Comments p.10: “For example, NCLC, CHPC and NHLP in their initial brief proposed contributions from owners that could be required per unit/per</p>	Verified.

	<p>building; limited incentives for a whole building audit; and a program-level annual spending cap, “with such a cap bearing a fair and reasonable relationship to the number of income eligible multifamily units as a percentage of all income eligible ESAP households.” In addition, NCLC, CHPC and NHLP recommended using a whole-building energy audit to determine which common area measures justified ESA investments. This will be facilitated by better coordination with EUCA for Multifamily, which requires an energy assessment of the property. We are eager to work with the IOUs to develop appropriate cost controls in order to allow new measures to be offered by ESAP. To the extent that ESAP offers deeper energy savings, it is more likely to attract additional participants.”</p> <p>D.14-08-030 at p. 64: “With the rollout of the above adopted highlighted recommendations, the ESA Program will also be in a better position to coordinate with multifamily energy efficiency offerings to deliver full-building measures where those measures are cost-effective and where the energy savings and benefits can be directly linked to low-income tenants. Based on the foregoing, the IOUs are directed to incorporate the above adopted recommendations in the 2015-2017 applications and should propose new, cost-effective measures for the multifamily sector, including common area measures and central heating, cooling, and hot water systems. The IOUs’ proposals for the new multifamily measures, which may be expensive on a per unit basis, should include (1) a total budget for the measure and a proposed budget allocation, (2) an explanation of why the proportion proposed to be used for these measures is reasonable, and (3)</p>	
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	a description of how other energy efficiency program funds, such as Energy Upgrade California and federal energy efficiency programs, will be leveraged.”	
<p>7. Multifamily Segment Study: Adopt the Multifamily Segment Study and direct the IOUs to implement its recommendations.</p> <p>CHPC recommendation the adoption and implementation of this study because considerable time and effort was invested in it by many other parties in this proceeding and it was well overseen by a study group of IOUs and Energy Division staff.</p> <p>This study was ordered in the Phase One Decision 12-08-044 with explicit direction to make “recommendations on: (a) “how the ESA Program can be modified to better meet the needs of its low income multifamily residents;” and (b) “how multifamily segment measure offerings should be modified (including central system needs) and develop possible co-pay or financing frameworks that comply [with] the ESA cost-effectiveness approach” (Decision 12-08-044, pp.164-166)</p>	<p>“Response of NCLC, CHPC, NHLP to “Southern California Edison Company Motion For An Extension Of Time To File” ESA and CARE Programs And Budgets” filed on April 4, 2014 (April 4th Comments) p. 3: “Prompt issuance of a clear and explicit Guidance Decision will facilitate the companies being able to respond to a broad range of issues that were litigated but not fully decided in D.12-08-0443 and to incorporate valuable work done since issuance of that decision through various working groups and consultant efforts. For example, NCLC/CHPC/NHLP believe that the multifamily segment study led by Cadmus Group provided valuable information and recommendations, and that a prompt and clear Guidance Decision could ensure that the companies properly consider the results of that study when filing their three-year programs and budgets for ESA and CARE.”</p> <p>April 4th Comments p.4: “As to the “Multifamily” issues, NCLC/CHPC/NHLP presented the expert testimony of several witness; they and other parties fully briefed the issues; and the Commission ultimately ordered in D. 12-08-044 an exhaustive multifamily segment study carried out by the Cadmus Group. A number of productive stakeholder meetings were held in connection with the multifamily segment study. NCLC/CHPC/NHLP think the Commission could – and, respectfully, should – issue clear and explicit guidance promptly to the companies as to the recommendations proposed by Cadmus</p>	Verified.

	<p>that the companies should address in their three-year plan filings.”</p> <p>June 2nd Comments p. 4: “The studies clearly show that improving the energy savings potential of ESAP and improving enrollment procedures will increase the number of customers served by ESAP. The proposed decision offers a number of helpful suggestions for the IOU applications, but the CPUC must issue clear policy directives if it wishes the IOUs to take meaningful action to reform ESAP in the near term, especially for multifamily housing. Clear direction will enable the ESAP reforms that are ready and cost effective to move forward, and not delay recommended improvements for another application cycle.”</p> <p>July 17th Comments p. 15: “An extraordinary amount of time and money has already gone into conducting studies, running working groups, and developing recommendations to improve ESAP. The Multifamily Commenters believe the APD represents an important step forward in implementing an effective and equitable program for low-income households in California. In particular, we support the ADP’s adoption of the recommendations of the Cost-Effectiveness Working Group, the 2013 Low-Income Needs Assessment, and the 2013 Multifamily Segment Study.”</p> <p><i>Ex Parte</i> Dec. 17th: “During the meetings [with CPUC advisors Khosrowjah and Baker] CHPC, NCLC and NHLP representatives provided a copy of the CHPC publication ‘<i>Greening City Gardens</i>’ and provided support for the recommendations made in the ESAP Multifamily Segment Study, which was recently finalized.”</p>	
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	<p>D.14-08-030 pp. 2-3: “This decision resolves and/or continues the review of several pending Phase II issues, as follows:... Adopts and directs implementation of the key recommendations from the 2013 Multifamily Segment Phase I Study.”</p> <p>D.14-08-030 p. 62: “We therefore adopt the some of the key recommendations from the Multifamily Segment Study, and they are summarized and highlighted below...”</p> <p>D.14-08-030 pp. 63-64: “In general, the IOUs are directed to thoroughly review the Multifamily Segment Study. The findings and recommendations therein shall inform and guide the IOUs in their preparation of their 2015-2017 ESA and CARE Program applications. The IOUs shall incorporate, in their respective strategies, findings and recommendations from this study to propose ways to improve the ESA Program in the upcoming 2015-2017 cycle. The IOUs are directed to prepare their 2015-2017 ESA and CARE Program applications which clearly reflect the above key and highlighted recommendations and propose modifications to the 2015-2017 ESA Program accordingly.”</p>	
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA)² a party to the proceeding?	Yes	Verified.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified.

² The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>c. If so, provide name of other parties:</p> <p>Our position was most closely aligned with NCLC and NHLP they were our main contact throughout the proceeding, but we also worked with and found common goals with:</p> <p>NRDC, ORA, TURN, Center for Accessible Technology and Greenlining Institute.</p>	<p>Verified.</p>
<p>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>CHPC worked most closely with NCLC, NHLP and NRDC on a multitude of issues, however we carefully divided issues so that no extraneous work was performed. (Note: NHLP will not be submitting an intervenor compensation claim in this proceeding.) With these parties, we explicitly share goals for improved energy efficiency in multifamily housing serving low income residents. However, CHPC has direct access to multifamily property owners and managers who have detailed their experience of barriers accessing existing programs, which informs CHPC's recommendations. Therefore CHPC provided extensive briefings and coordinated policy recommendations from owners and lenders in order to build consensus for program improvements recommended in our comments.</p> <p>We worked together with NCLC on all issues, coordinating our work by phone and carefully dividing up writing assignments and meetings. Examples include: preparation for, and presentations at, the Multifamily Segment Study workshops; dividing issues to draft separately in June 2nd comments' and drafting separate sections for the comments which we jointly filed. CHPC handled most of the in-person meetings due to our location in San Francisco.</p> <p>We coordinated our positions with NRDC, deferring to and endorsing their work on cost-effectiveness issues and securing their support for our positions on the multifamily issues listed in this claim. We handled most of the scheduling and participated jointly with NRDC and NHLP on in person ex parte meetings with advisors to the Commissioners.</p> <p>We have had several discussions with ORA, keeping them abreast of our recommendations and deferring to them on issues including data collection. For example we provided ORA an extensive briefing multifamily issues on January 14, 2014 . In those discussions, CHPC kept ORA fully abreast of the issues we intended to address in our workshop presentations and comments, so that ORA would not need to duplicate any of our work on multifamily issues. CHPC elicited from ORA the extent to which it planned to address the multifamily issues that were the focus of our efforts. As the briefs and other documents filed in this case make clear, this coordination effort relieved ORA of the burden of addressing these issues in depth.</p> <p>Similarly, CHPC had numerous phone calls and e-mail exchanges with several of</p>	<p>Verified, but see duplication, above, and CPUC Disallowances and Adjustments, below.</p>

the Consumer Coalition namely TURN, Center for Accessible Technology, and Greenlining. We carefully coordinated our positions with ORA and the Consumer Coalition particularly in the March Comments and Reply to the February 25, 2014 “Assigned Commissioner Ruling on Categorical Eligibility and Enrollment and Definition of Income” in which we endorsed the position of these groups and questions 1,2 and 5 and they endorsed our positions on questions 3 and 4. We were able to share our conversations with multifamily property owners and our 25 years of affordable housing finance expertise. We also explored the importance for the multifamily sector to move towards a property owner path for energy efficiency with coordinated programs in order to overcome barriers to participation and achieve the deepest savings with the most cost-effective ratepayer investment.

In addition, CHPC coordinated the response of total of eight parties in this proceeding in order to draft the Open Letter to the Commissioners filed on August 1, 2014 which provided a coordinated recommendation to the CPUC on several issues that had been in dispute. CHPC secured the support of the organization signators to the letter, including ORA, by incorporating their comments and developing a consensus statement to assist the Commission.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§§ 1801 & 1806):

a. Intervenor’s claim of cost reasonableness:	CPUC Verified
<p>CHPC advocates for the interests of low-income multifamily tenants and affordable housing building owners/managers. CHPC has significant experience in affordable housing finance, and works with multifamily housing owners and tenants on energy efficiency retrofits. CHPC made specific program recommendations in order to improve the ESAP program and to meet owners and tenants needs under feasible requirements. Most of CHPC’s recommendations were adopted in Decision 14-08-030 (pp. 63- 64; 102-103.)</p>	<p>Verified.</p>
<p>b. Reasonableness of Hours Claimed:</p> <p>CHPC coordinated with other parties to avoid duplication of efforts (Part II(B)(d) above).</p> <p>CHPC’s total hours claim is conservative for the following reasons:</p> <p>1. CHPC worked diligently to divide labor internally to those best suited for the particular tasks. Megan Kirkeby, CHPC’s Sustainable Housing Policy Manager, had primary responsibility for performing substantive research, and for the drafting and review of filings and other proceeding-related documents. Ann Gressani, consultant to CHPC, was the primary assistant to Megan Kirkeby in all proceeding-related activities including drafting and review of filings and coordinating with other parties.</p>	<p>Verified, but <i>see</i> CPUC Disallowances & Adjustments, below.</p>

Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Megan Kirkeby (Expert and Advocate)	2013	47.5	\$165	See Comment 1	\$7,837.50	44.95	\$135.00 <i>See</i> D.14-08-054.	\$6,068.25
Ann Gressani (Expert and Advocate)	2013	41.5	\$250	See Comment 2	\$10,375.00	36.9	\$250.00 [1]	\$9,225.00
Megan Kirkeby (Expert and Advocate)	2014	27.25	\$165	See Comment 1	\$4,496.25	23.14	\$140.00 <i>See Res</i> ALJ-303.	\$3,239.60
Ann Gressani (Expert and Advocate)	2014	64.25	\$250	See Comment 2	\$16,062.50	55.36	\$255.00	\$14,116.80
	Subtotal:\$38,711.25					Subtotal: \$32,649.65		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Megan Kirkeby	2014	6.5	\$82.50	See Comment 1	\$536.25	6.5	\$70.00	\$455.00
Ann Gressani	2014	18.5	\$125	See Comment 2	\$2,312.50	18.5	\$127.50	\$2,358.75
	Subtotal:				\$2,848.75	Subtotal:		\$2,813.75
TOTAL REQUEST: \$41,620.00						TOTAL AWARD: \$35,463.40		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								

C. CHPC Comments on Part III:

Comment #	Comment
Comment #1	Megan Kirkeby, Sustainable Housing Policy Manager: Megan Kirkeby provides program level support for the Green Rental home Energy Efficiency Network (GREEN), as well as supporting CHPC's research, communications, and policy

	<p>initiatives. Megan received a Bachelor of Arts in Global Economics from the University of California, Santa Cruz and received a Master of Public Policy with a concentration in Urban Planning and Regional Development from the UCLA Luskin School of Public Affairs in June of 2012. Megan has over 7 years experience in affordable housing policy. Prior to joining CHPC, Megan was the Policy Associate for the Non-Profit Housing Association of Northern California where she led numerous issue-focused working groups, and provided in depth research on a wide variety of relevant topics. She also participated in the Housing CA Land Use and Finance Committee, as well as the National Low Income Housing Coalition's State Partner Working Group.</p> <p>Resolution ALJ-287 adopted Intervenor rates for 2013. The range for all experts is \$135-\$410. CHPC requests that Ms. Kirkeby's hours be billed at \$165, which is at the low end of the range for her experience level and in line with her rate for public contracts. Ms. Kirkeby is fairly new to working at the CPUC, with two years of experience in this policy arena, but considering Ms. Kirkeby's more than 7 years experience in affordable housing policy and research, we believe this rate is appropriate. Her claim preparation time will be requested at ½ of \$165, or \$82.50 per hour.</p>
Comment #2	<p>Ann Gressani, Consultant to CHPC</p> <p>Ann is an independent consultant specializing in California public utilities policy. She has over twenty-five years experience working with the California Legislature and Public Utilities Commission. She served the California State Senate as Principal Consultant to the Energy and Public Utilities Committee in the 1980's, managed State Government and Regulatory Affairs in California and other western states for MCI Telecommunications in the 1990's and most recently has assisted several affordable housing non-profit organizations with state and federal policy issues.</p> <p>Resolution ALJ-287 adopted Intervenor rates for 2013. The range for all experts is \$135-\$410. CHPC requests that Ms. Gressani's hours be billed at \$250 which is at the mid range for her experience level. Considering Ms. Gressani's more than 25 years of utility issues policy experience and affordable housing experience, we believe this rate is appropriate. Her claim preparation time will be requested at ½ of \$250, or \$125.00 per hour.</p>

D. CPUC Disallowances and Adjustments:

#	Reason
[1]	The Commission approves Gressani's rate of \$250 for 2013. After applying the 2014 cost-of-living adjustment, Gressani's 2014 rate is set at \$255.
[2]	Duplication with other parties occurred when preparing work on the following issues: (A) property owner path; (B) housing subsidies/income; (C) expedited enrollment; and (D) single point of contact. As such, the Commission has reduced these issues by 20%. A total of 20.15 hours is disallowed from CHPC's request.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No.
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(2)(6))?	Yes.

FINDINGS OF FACT

1. California Housing Partnership Corporation has made a substantial contribution to D.14-08-030.
2. The requested hourly rates for California Housing Partnership Corporation's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable compensation is \$35,463.40.

CONCLUSION OF LAW

1. The Claim, with the adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. California Housing Partnership Corporation is awarded \$35,463.40.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall pay California Housing Partnership Corporation their respective shares of the award, based on their California-jurisdictional gas and electric revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 3, 2015, the 75th day after the filing of California Housing Partnership Corporation's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, 2015, at San Francisco, California.

APPENDIX
Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1408030		
Proceeding(s):	A1105017 et al.		
Author:	ALJ Kim		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
California Housing Partnership Corporation (CHPC)	10/20/2014	\$41,620.00	\$35,463.40	N/A	See Disallowances & Adjustments, above.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Megan	Kirkeby	Expert/Advocate	CHPC	\$165	2013	\$135.00
Megan	Kirkeby	Expert/Advocate	CHPC	\$165	2013	\$140.00
Ann	Gressani	Expert/Advocate	CHPC	\$250	2013	\$250.00
Ann	Gressani	Expert/Advocate	CHPC	\$250	2014	\$255.00

(END OF APPENDIX)